

1446 (a) hereto as Exhibit "A.") The Complaint seeks \$175,000 in compensatory damages and \$1,400,000 in punitive damages.

3.

Exhibit "A" comprises all the documents of which Defendants are aware that are either filed or served upon them in this matter to date.

4.

Plaintiff is a resident of Jefferson County, Tennessee. At all times relevant hereto, Plaintiff was the owner of the property at issue, located at 1321 West Old A J Highway, New Market, Jefferson County, Tennessee ("Property").

5.

Defendants are a foreign association of insurers whose principal place of business is located in London, England, United Kingdom.

6.

Because the parties are completely diverse and the amount in controversy exceeds the sum of \$75,000, jurisdiction is founded on diversity of citizenship pursuant to 28 U.S.C. §1332.

7.

Defendants' removal in this civil action is timely pursuant to U.S.C. § 1446 (b)(1) in that less than thirty (30) days have elapsed since Defendants received a copy of the summons and complaint by service. *See Murphy Bros. Inc. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 347-48 (1999).

8.

Defendants are timely providing written Notice of Removal of the civil action to Plaintiff and are filing a copy of the Notice with the Clerk of the Circuit Court in which the action is

pending. (*A true and correct copy of Defendants' Notice of Filing of Removal, which Defendants are filing in the State Court, is attached hereto as Exhibit "B".*)

WHEREFORE, Defendants respectfully request that Case Number 24142-IV, currently pending in the Jefferson County Circuit Court, Dandridge, Tennessee be removed to the United States District Court for the Eastern District of Tennessee, Knoxville Division.

Respectfully submitted this 15th day of December 2014.

/s/ Renee Levay Stewart

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/s/ Nanette L. Wesley

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

JUSTIN C. NELSON

Plaintiff,

v.

**CERTAIN UNDERWRITERS AT
LLOYD'S, LONDON SUBSCRIBING
TO POLICY NUMBER AVAC046891**

Defendants.

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CIVIL ACTION FILE
NO: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served a copy of the foregoing **NOTICE OF REMOVAL**, by depositing a true and correct copy of same in the United States Mail, with adequate postage thereon, and via electronic filing, and addressed to counsel of record as follows:

J. Brandon McWherter, Esq.
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341 Cool Springs Boulevard
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Franklin, TN 37067

Clinton H. Scott, Esq.
Gilbert Russell McWherter Scott & Bobbitt, PLC
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Respectfully submitted this 15th day of December 2014.

/s/ Renee Levay Stewart
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